

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

In Re: ASACOL ANTITRUST LITIGATION

Civil Action No. 1:15-cv-12730 (DJC)

This Document Relates To:

ALL END-PAYOR ACTIONS

**END-PAYOR PLAINTIFFS' MOTION
TO EXCLUDE THE TESTIMONY OF DR. BRUCE A. STROMBOM**

Plaintiffs Teamsters Union 25 Health Services & Insurance Plan, NECA-IBEW Welfare Trust Fund, Wisconsin Masons' Health Care Fund, and Minnesota Laborers Health and Welfare Fund (collectively "Plaintiffs"), individually and on behalf of all others similarly situated, hereby move pursuant to the Federal Rules of Evidence 702 and 403 and *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993), to exclude the proposed expert testimony of Dr. Bruce A. Strombom in its entirety for the reasons set forth in the accompanying memorandum.

WHEREFORE, Plaintiffs respectfully request that this Court exclude the proposed expert testimony of Dr. Strombom in its entirety and provide such other and further relief as this Court deems appropriate.

Dated: September 11, 2017

Respectfully submitted,

/s/ Nathaniel L. Orenstein

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CERTIFICATE OF SERVICE

I, Nathaniel L. Orenstein, hereby certify that this document was electronically filed and served using the Court's ECF system on September 11, 2017.

/s/ Nathaniel L. Orenstein
Nathaniel L. Orenstein